

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:) Chapter 11
)
FTX TRADING LTD., <i>et al.</i> ,) Jointly Administered
)
Debtors. ¹) Case No. 22-11068 (JTD)

AMENDED NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that the undersigned appears as proposed counsel to Emergent Fidelity Technologies Ltd (“Emergent”), as debtor and debtor-in-possession, under the control of Angela Barkhouse and Toni Shukla as the Joint Provisional Liquidators pursuant to the Appointment Order² of the Eastern Caribbean Supreme Court, High Court of Justice, Antigua and Barbuda, dated December 5, 2022, and pursuant to Fed. R. Bankr. P. 2002, 3017 and 9010 and 11 U.S.C. § 1109(b), requests that all notices given or required in this case, and all documents, and all other papers served in this case, be given to and served upon:

Jody C. Barillare (Bar No. 5107)
Morgan, Lewis & Bockius LLP
1201 N. Market Street, Suite 2201
Wilmington, DE 19801
Telephone: (302) 574-3000
Facsimile: (302) 574-3001
jody.barillare@morganlewis.com

John C. Goodchild III
Matthew C. Ziegler
Morgan Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-5000
Facsimile: (215) 963-5001
john.goodchild@morganlewis.com
matthew.ziegler@morganlewis.com

Joshua Dorchak
David K. Shim
Morgan, Lewis & Bockius LLP
101 Park Avenue
New York, NY 10178
Telephone: (212) 309-6000
Facsimile: (212) 309-6001
joshua.dorchak@morganlewis.com
david.shim@morganlewis.com

PLEASE TAKE FURTHER NOTICE that pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the rule specified above but also includes, without limitation, orders and notices of any application, motion, petition,

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The Appointment Order is attached as Exhibit B to the *Declaration of Angela Barkhouse in Support of the Debtor’s Chapter 11 Petition* filed in the chapter 11 case of Emergent pending before this Court [Case No. 23-10149, D.I. 3].

pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronically or otherwise, which affects the Debtors or the property of the Debtors.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, defenses, setoffs, or recoupments to which Emergent is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: February 13, 2023
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

/s/ Jody C. Barillare
Jody C. Barillare (Bar No. 5107)
1201 N. Market Street, Suite 2201
Wilmington, DE 19801
Telephone: (302) 574-3000
Email: jody.barillare@morganlewis.com

- and -

John C. Goodchild, III
Matthew C. Ziegler
1701 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-5000
Email: john.goodchild@morganlewis.com
Email: matthew.ziegler@morganlewis.com

- and -

Joshua Dorchak
David K. Shim
101 Park Avenue
New York, NY 10178
Telephone: (212) 309-6000
Email: joshua.dorchak@morganlewis.com
Email: david.shim@morganlewis.com

*Proposed Counsel for Emergent Fidelity
Technologies Ltd as Debtor and Debtor-in-
Possession*

CERTIFICATE OF SERVICE

I certify that on this 13th day of February 2023, a true and correct copy of the foregoing *Amended Notice of Appearance and Request for Service* was sent via ECF Noticing to all parties receiving ECF Notices in these chapter 11 cases.

/s/ Jody C. Barillare
Jody C. Barillare, Esq.